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March 15, 2022

Via ECF

Hon. John P. Cronan
United States District Court
for the Southern District of New York
40 Foley Square
New York, NY 10007

Re: *United States v. Jamarri Reid*, 21 Cr. 174 (S.D.N.Y.) (JPC)

Dear Judge Cronan:

I represent Jamarri Reid in the above-captioned matter. Mr. Reid is scheduled to be sentenced on May 3, 2022 in connection to his open plea to a single count of possession of ammunition after previously having been convicted of a New York State E felony. Because of hurdles in meeting with Mr. Reid in person at the Metropolitan Detention Facility, impeding the work of the defense experts in this case, I respectfully request that this Court adjourn the sentencing for a period of 30-days.

Following the return of in-person visits at the MDC, the defense team promptly requested to reserve a private visiting room where diagnostic testing could be performed. The visiting area of the MDC has approximately seven private rooms which, as a general matter, are filled first-come, first-served. Once those rooms are full, all other visits take place in a common space where clients and attorneys meet in the same room as correctional staff. The MDC has, in theory, a procedure by which the private rooms can be reserved in advance as needed, but the process for doing so has, in recent months, not been consistently implemented. In this case, it took several requests before a private room could be reserved and even after doing so, the room was not, in fact, set aside for the expert upon her arrival. While she has now been able to perform her first in-person diagnostic exam, she will need to meet with Mr. Reid again – either in person or by video teleconference. Given the delays in arranging the initial meeting, it is likely that the follow-up visits will not be completed in time for the expert to prepare any report or to provide relevant information to counsel for purposes of the defense sentencing submission in time to include in advance of the currently scheduled May 3, 2022 sentencing hearing. While the defense team is working on resolving those, we do not believe we will have the information necessary to sufficiently address the criminal history calculation questions by May 3, 2022.

United States v. Reid – 21 Cr. 174

March 15, 2022

Page 2 of 2

Accordingly, and in light of the above, I respectfully request that this Court adjourn the current sentencing from May 3, 2022 for approximately thirty days, until a date in early June 2022, which should be adequate time to complete all pending interviews and complete all necessary reports for the Court.

This is the third request for an adjournment. The Court granted the previous requests. The government does not object to this request.

Respectfully submitted,

/s/

Megan W. Benett

Counsel for Jamarri Reid

cc: all counsel via ECF

The sentencing for Jamarri Reid scheduled for May 3, 2022 is adjourned to May 31, 2022 at 10:00 a.m., contingent on the ability of the jail and the U.S. Marshals Service to facilitate the Defendant's transportation to the Courthouse at that date and time. The Court will confirm with the parties closer to the scheduled date.

SO ORDERED.

Date: March 15, 2022
New York, New York



JOHN P. CRONAN
United States District Judge